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Via ECF

The Honorable Margeret M. Garnett, U.S.D.J
 United States District Court
 Southern District of New York
 40 Foley Square, Room 2102
 New York, NY 10007

Re: REYES v. TAI THAI THAILAND HOME COOKING INC. ET AL.

Civil Action No.: 1:24-cv-02242-MMG

Letter Motion For Adjournment of Deadlines and Extension of Time to Respond to Complaint

Dear Judge Garnett:

We were recently retained and entered our appearance on behalf of Defendant Maxanne Realty, Inc. (“Maxanne”) in the above-referenced ADA matter. I write with the consent of Plaintiff’s counsel to respectfully request an extension of time to respond to the Complaint and an adjournment of the deadlines provided by Your Honor in the Order dated March 27, 2024 (ECF. 7). The reason for this request is that the undersigned requires more time to become familiarized with the facts of this case and the parties need more time for the one hour minimum meet and conferral. Thus, the parties respectfully request that the below deadlines be moved to the following dates:

Defendant’s Time to Respond to Complaint		December <u>23</u> , 2024
Meet and Conferral		On or before November 12, 2024
Joint-Letter by Parties re: Results of Meet and Conferral		November 19, 2024
Initial Case Conference	November 12, 2024	Adjourned <i>sine die</i> or such later date convenient for the Court

There has been no prior requests for adjournment or extensions of time by Maxanne. A stipulation signed by the parties extending Maxanne’s time to answer as well as vacating the Clerk’s Certificate of Default against Maxanne is annexed hereto.

We thank Your Honor for the Court’s time and attention to this request.

Very truly yours,

/s/ Farzad Ramin
 Farzad Ramin

Application GRANTED. It is hereby ORDERED that the schedule jointly proposed by the parties shall be so-ordered, and the November 12, 2024 conference is ADJOURNED *sine die*. The Clerk of Court is respectfully directed to terminate Dkt. No. 31.

SO ORDERED. Dated October 25, 2024



HON. MARGARET M. GARNETT
 UNITED STATES DISTRICT JUDGE